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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 CARMELA BRADLEY,
Petitioners,
12 vs.
13 ATTORNEY GENERAL OF THE STATE OF
NEVADA, *et al.*,
14 Respondents.

Case No. 2:13-cv-01196-RFB-GWF

**MOTION FOR ENLARGEMENT OF TIME
(FIRST REQUEST)**

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16 Respondents, by and through counsel, Adam Paul Laxalt, Attorney General of the State of
17 Nevada, hereby respectfully move this Court for an order granting a twenty-one (21) day enlargement
18 of time, to and including July 27, 2018, in which to file and serve their reply.

19 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure
20 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and
21 other materials on file herein.

22 There have been no prior enlargement of Respondents' time to file said reply, and this motion is
23 made in good faith and not for the purposes of delay.

24 RESPECTFULLY SUBMITTED this 5th day of July, 2018.

25 ADAM PAUL LAXALT
26 Attorney General

27 By: /s/ Jeffrey M. Conner
28 JEFFREY M. CONNER (Bar. No. 11543)
Assistant Solicitor General

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 CARL BRADLEY,

11 Petitioners,

12 vs.

13 ATTORNEY GENERAL OF THE STATE OF
14 NEVADA, *et al.*,

15 Respondents.

Case No. 2:13-cv-01196-RFB-GWF

DECLARATION OF COUNSEL

16 I, JEFFREY M. CONNER, declare under penalty of perjury:

17 1. I am an Assistant Solicitor General in the Office of the Attorney General of the State of
18 Nevada, and I make this declaration on behalf of Respondents' motion for enlargement of time in the
19 above-captioned matter.

20 2. Respondents reply in support of the motion to dismiss is due July 6, 2018. By this motion,
21 I am requesting an enlargement of twenty-one (21) days, to and including July 27, 2018. This is
22 Respondents' first request for an enlargement to file the reply.

23 3. Since Bradley filed his response to the motion to dismiss, I have been busy working on
24 numerous other federal matters, including completing an answering brief in *Redeker v. Neven*, No. 17-
25 16917 (9th Cir.), which is due on July 9, 2018. Additionally, I have numerous impending deadlines
26 over the next two weeks in other federal habeas corpus matters, many of which have also been
27 extended. In light of the foregoing, Respondents respectfully request that this Court issue an order
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granting them an enlargement of twenty-one (21) days to, and including, July 27, 2018, to file a reply in support of the motion to dismiss.

4. I contacted opposing counsel, Assistant Federal Defender Amelia Bizzaro, and she indicated she has no objection to Respondents' request for additional time.

5. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

By: /s/ Jeffrey M. Conner
JEFFREY M. CONNER (Bar. No. 11543)
Assistant Solicitor General

IT IS SO ORDERED:

RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 19th day of July, 2018.

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on the 5th day of July, 2018, I caused to be served a copy of the foregoing **MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)**, by U.S. District Court CM/ECF Electronic Filing to:

Amelia L. Bizzaro
Assistant Federal Public Defender
411 East Bonneville Ave, Suite 250
Las Vegas, NV 89101

/s/ Amanda White